

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RAYNARD POWELL	:	VIOLATIONS:
NATHANIEL WILLIAMS	:	18 U.S.C. § 1951 (conspiracy to commit robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 1951 (robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 924(c)(1)(using and carrying a firearm during a crime of violence)- 1 count
	:	18 U.S.C. § 2(a)(aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Govberg Jewelers was a business engaged in interstate commerce.

2. On or about June 4, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**RAYNARD POWELL and
NATHANIEL WILLIAMS**

conspired and agreed, together and with others unknown to the grand jury, to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, in that defendants POWELL and WILLIAMS, and others unknown to the grand jury, agreed to unlawfully take and obtain jewelry from Govberg Jewelers, a business engaged in interstate commerce, in the presence of employees of that business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their control, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

3. It was part of the conspiracy to rob Govberg Jewelers by use of force, threats of force, and violence, and through the use of a dangerous weapon, that is, a handgun.

OVERT ACTS

In furtherance of the conspiracy, defendants RAYNARD POWELL and NATHANIEL WILLIAMS, and other persons unknown to the grand jury, committed the following overt acts, among others, on or about June 4, 2009, in the Eastern District of Pennsylvania and elsewhere:

1. Defendants RAYNARD POWELL and NATHANIEL WILLIAMS, and other persons unknown to the grand jury, traveled to Govberg Jewelers (“the store”), located at 1818 Chestnut Street in Philadelphia, Pennsylvania.

2. Defendants RAYNARD POWELL and NATHANIEL WILLIAMS, and other persons unknown to the grand jury:

- a. entered the store with two handguns;
- b. assaulted the store’s security guard with chemical spray;
- c. pointed a handgun at a female employee;
- d. smashed open one jewelry display case and removed nine Audemars Piguet watches valued at approximately \$216,800;
- e. attempted to smash open a second jewelry display case; and
- f. fled from the store.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1 and Overt Acts 1 and 2 of Count One of this indictment are incorporated here.

2. On or about June 4, 2009, in the Eastern District of Pennsylvania, defendant

**RAYNARD POWELL and
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obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants POWELL and WILLIAMS, and other persons unknown to the grand jury, unlawfully took and obtained, and aided and abetted the taking and obtaining of, personal property, that is, approximately \$216,800 in jewelry belonging to Govberg Jewelers, from employees, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by pointing a handgun at an employee and spraying chemical spray at a security guard.

In violation of Title 18, United States Code, Sections 1951(a), (b)(1), (b)(3), and 2(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1 and Overt Acts 1 and 2 of Count One of this indictment are incorporated here.
2. On or about June 4, 2009, in the Eastern District of Pennsylvania, defendants

**RAYNARD POWELL and
NATHANIEL WILLIAMS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, conspiracy to commit robbery which interferes with interstate commerce, and robbery which interferes with interstate commerce, of Govberg Jewelers, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

FOREPERSON

MICHAEL L. LEVY
United States Attorney